## **Appendix S**

### **Fixed Gauge Audit Checklist**

This form can be used to document the annual radiation protection program audit as required by 180 NAC 4-004. The audit consists of a review of the program's content and implementation, evaluating it's effectiveness in complying with regulatory requirements and keeping radiation exposures to worker and general public as low as reasonable achievable (ALARA). Records of annual audits must be available for inspection by the Agency.

**NOTE:** All areas indicated in this audit checklist may not be applicable to every license and

may not need to be addressed during each audit. Licensee's name: License No. License No. Auditor: \_\_\_\_\_\_Date of Audit \_\_\_\_\_Telephone No.\_\_\_\_\_ (Signature) 1. Audit History A. Last audit of this location conducted on (date) B. Were previous audits conducted at intervals not to exceed 12 months? [180 NAC 4-004] Yes No C. Were records of previous audits maintained? [180 NAC 4-047] N/A Yes No D. Were any deficiencies identified during last two audits or two years, whichever is longer? No If yes please write a brief description of prior deficiencies and corrective actions taken:

### 2. Organization and Scope of Program

A.	If the mailing address or permanent address changed, has the license has been amended to reflect the change?	N/A	Yes	No	
В.	If ownership changed or bankruptcy filed, was the Agency's prior consent obtained or was the Agency notified?	N/A	Yes	No	
C.	If the RSO was changed, was license amended?	N/A	Yes	No	
D.	Does new RSO meet the Agency training requirements?	N/A	Yes	No	
E.	Is the RSO fulfilling his/her duties?	N/A	Yes	No	
F.	To whom does the RSO report?		_		
G.	If the designated contact person for the Agency changed, was the Agency notified?	N/A	Yes	No	
H.	Does the license authorize all of the Agency-regulated radionuclides contained in gauges possessed?	N/A	Yes	No	
I.	Are the gauges as described in the Sealed Source and Device (SSD	) Regi	stratio	n	
	Certificate or Sheet?		Yes		
	Have copies of (or access to) SSD Certificates?		Yes	No No	
	Have manufacturers' manuals for operation and maintenance?		Yes	No	
J.	Are the actual uses of gauges consistent with the authorized uses listed on the license?	N/A	Yes	No	
K.	Is company management appropriately involved with the radiation protection program and oversight of the RSO's activities?		Yes	No	
L.	Does RSO have sufficient time to perform all duties/responsibilities	es?	Yes	No	
Training and Instructions to Workers					
A.	Were all workers who are likely to exceed 100 mrem/yr provided training per 180 NAC 10-003?	adiatio	n awa Yes		
В.	Did each authorized user complete a 8 hour course provided by the manufacturer of the device or any agency approved course?		Yes	No	
C.	Are training records maintained for each gauge operator?		Yes	No	
D.	Did interviews with operators reveal that they know the emergency procedures?		Yes	No	

3.

	M.	Did this audit include observations of operators: using the gauge in a field situation? Operating the gauge? Performing routine cleaning and lubrication? Transporting the gauge? Storing the gauge?		Ye Ye Ye Ye	es No es No
	E.	HAZMAT training provided as required? [49 CFR 172.700, 49 CF CFR 172.702, 49 CFR 172.703, 49 CFR 172.704]	R 172 N/A		No
4.	Ra	diation Survey Instruments			
	A.	If the licensee possesses its own survey meter, does it meet the Agency's criteria?	N/A	Yes	No
	В.	If the licensee does not possess a survey meter, are specific plans made to have one available?	N/A	Yes	No
	C.	Is the survey meter needed for non-routine maintenance calibrated as required (180 NAC 4-021)?	N/A	Yes	No
	D.	Are calibration records maintained (180 NAC 4-048)?	N/A	Yes	No
5.	Ga	nuge Inventory			
	A.	Is a record kept showing the receipt & transfer/disposal of each gauge? (180 NAC 1-004)		Yes	No
	B.	Are all gauges received physically inventoried every six months?	N/A	Yes	No
	C.	Are records of inventory results with appropriate information maintained?		Yes	No
6.	Pe	rsonnel Radiation Protection			
	A.	Are ALARA considerations incorporated into the radiation protection program? (180 NAC 4-004.02)_		Yes	No
	В.	Is documentation kept showing that unmonitored users receive ≤10% of limit? (180 NAC 4-022.01)		Yes	No
	C.	Did unmonitored users' activities change during the year which could put them over 10% of limit?		Yes	No
	D.	If yes to c. above, was a new evaluation performed? No			Yes

	E.	, 1	Yes Yes	No No
		1) Is the dosimetry supplier NVLAP approved? (180 NAC 4-021.03)	Yes	No
		2) Are the dosimeters exchanged monthly for film badges and at industry recommended frequency for TLDs?	Yes	No
		3) Are dosimetry reports reviewed by the RSO when they are received?	Yes	No
		4) Are the records Agency Forms or equivalent? (180 NAC 4-009.04, 180 NAC 4-052.03)	Yes	No
		<ul> <li>NRH-1 "Cumulative Occupational Exposure History" completed?</li> </ul>	Yes	No
		<ul> <li>NRH-2 "Occupational Exposure Record for a Monitoring Period" completed?</li> </ul>	Yes	No
		5) If a worker declared her pregnancy, did licensee comply with (180 NAC 4-012)?	Yes	No
		<ul> <li>Were records kept of embryo/fetus dose per 180 NAC 4-052.04?</li> </ul>	Yes	No
	F.	Are records of exposures, surveys, monitoring, and evaluations maintaine (180 NAC 4-047, 180 NAC 4-48, 180 NAC 4-052)	ed Yes	No
7.	Pu	blic Dose		
	A.	Are gauges stored in a manner to keep doses below 100 mrem in a year? (180 NAC 4-013.01, Item 1)	Yes	No
	B.	Has a survey or evaluation been performed per 180 NAC 4-021.01?	Yes	No
		Have there been any additions or changes to the storage, security, or use of surrounding areas that would necessitate a new survey or evaluation?	of Yes	No
	C.	Do unrestricted area radiation levels exceed 2 mrem in any one hour? (180 NAC 4-013.01, Item 2)	Yes	No
	D.	Are gauges being controlled in a manner that would prevent unauthorized use or removal? (180 NAC 4-031)	l Yes	No
	E.	Records maintained? (180 NAC 4-048, 180 NAC 4-053]	Yes	No
8.	Ор	erating and Emergency Procedures		
	A.	Have operating and emergency procedures been developed?	Yes	No

	B.	Do they contain the required elements?	Yes	No
	C.	Does each individual working with the gauges have a current copy of the comergency procedures (including lock-out procedures and emergency telep	hone	
		numbers)?	Yes	No
	D.	Is a lock-out warning sign posted at each entryway to an area where it is perexposed to the beam?	ossible Yes	
	E.	Does the operating and emergency procedures list the correct phone number for the RSO and the Agency?	Yes	No
	F.	Did any emergencies occur?	Yes	No
		If so, and were they handled properly by operator?	Yes	No
		Were appropriate corrective actions taken?	Yes	No
9.	Le	ak Tests		
	A.	Was each sealed source leak tested every 6 months or at other prescribed intervals?	Yes	No
	В.	Was the leak test performed as described in correspondence with the Agency and according to the license?	Yes	No
	C.	Are records of results retained with the appropriate information included?	Yes	No
	D.	Were any sources found leaking? And if yes, was the Agency notified?	Yes Yes	No No
10	. Ma	nintenance of Gauges		
	A.	Are manufacturer's procedures followed for routine cleaning and lubrication of gauge?	Yes	No
	В.	3. Was each on-off mechanism tested for proper operation every 6 months or at other prescribed intervals? Yes No		
	D. Are repair and maintenance of components related to the radiological safety of the gauge performed by the manufacturer, distributor or person specifically authorized by the Agency, NRC or Agreement State and according to license requirements (e.g. extent of work, procedures, dosimetry, survey instrument, compliance with 180 NAC 4-013?			
		, r	Yes	
	E.	Is non-routine maintenance performed in-house?	Yes	No

- F. Is yes to E., is non-routine gauge maintenance conducted by authorized personnel following procedures approved by the Agency?

  Yes No
- G. Are labels, signs, and postings identifying gauges containing radioactive material, radiation areas, and lock-out procedures/warnings clean and legible? Yes No

#### 11. Transportation

(Note: This section will not apply if you have not transproted gauges during the period covered by this audit.)

A. Only DOT-7A or other authorized packages is used to transport		
gauges? [49 CFR 173.415, 49 CFR 173.416(b)]	Yes	No

- B. Package performance test records are on file? Yes No
- C. Special form sources documentation? [49 CFR 173.476(a)] Yes No
- D. Package has 2 labels (ex. Yellow-II) with TI, Nuclide, Activity, and Hazard Class? [49 CFR 172.403, 49 CFR 173.441]

  Yes No
- E. Packages used to ship gauges properly marked and labeled per 49 CFR 172.301, 49 CFR 172.304, 49 CFR 172.310 49 CFR 172.324? Yes No
- F. Shipping containers properly locked, blocked & braced prior to transport? [49 CFR 173.475(f)]

  Yes No
- G. Shipping papers prepared and used? [49 CFR 172.200(a)] Yes No
- H. Shipping papers contain proper entries? {Shipping name, Hazard Class, Identification Number (UN Number), Total Quantity, Package Type, Nuclide, RQ, Radioactive Material, Physical and Chemical Form, Activity, category of label, TI, Shipper's Name, Certification and Signature, Emergency Response Phone Number, Cargo Aircraft Only (if applicable)}
  [49 CFR 172.200, 49 CFR 172.201, 49 CFR 172.202, 49 CFR 172.203, 49 CFR 172.204, 49 CFR 172.604]
- I. Shipping papers within drivers reach and readily accessible during transport?

  [49 CFR 177. 817(e)] Yes No
- J. Secured against movement? [49 CFR 177. 834] Yes No
- K. Placarded on vehicle, if needed? [49 CFR 172.504] Yes No
- L. Proper overpacks, if used? [49 CFR 173.25] Yes No
- M. Any incidents reported to DOT? [49 CFR 171.15, 16] Yes No

# 12. Auditor's Independent Survey Measurements (If Made)

A.	Describe the type, location, and results of measurements. Do any radiation regulatory limits?				
No	otification and Reports				
	Was any radioactive material lost or stolen? (180 NAC 4-057,				
Λ.	180 NAC 3-026)	Yes	No		
	If yes, were reports made?	Yes			
В.	Did any reportable incidents occur? (180 NAC 4-058,				
	180 NAC 3-026)	Yes	No		
	If yes were reports made?	Yes	No		
C.	Did any overexposures and high radiation levels occur? (180 NAC 4-059				
	180 NAC 3-026)	Yes	No		
	Reported?	Yes	No		
N.	If any events (as described in items a through c above) did occur, what w	as root	caus		
	Were corrective actions appropriate?_	Yes	No		
F.	Is the licensee aware of telephone number for the Agency Emergency Operations Center?	Yes	No		
Po	esting and Labeling				
A.	Following documents are posted at permanent facility:				
D	NRH-3 "Notice to Employees" posted (180 NAC 10-002)	Yes	No		
Ď.	Below documents are posted or a notice indicating the location of the				
	following documents.? . Title 180 NAC	Yes	No		
	Operating &Emergency Procedures	Yes	No		
	Lock-out Procedures	Yes			
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		Any notice of violation involving radiological working conditions,	Yes	No
		proposed imposition of civil penalties, or order issued to 180 NAC and any response from the licensee.	Yes	No
	C.	Radiation signs: (180 NAC 4-034, 180 NAC 4-035)  1) "Caution (or Danger), Radioactive Material" signs: posted at facility (unlessdocumentation kept describing eligibility for exception described 180 NAC 4-035?	Yes	No
		<ul> <li>D. Gauges bear durable, clearly visible labels w/ radiation symbol,</li> <li>"Caution (or Danger), Radioactive Material" warning, &amp; sufficient information to permit individuals to avoid/minimize exposures?</li> </ul>	Yes	No
15.	.Re	cord Keeping for Decommissioning		
	A.	Records kept of information important to decommissioning? (180 NAC 3-017.07)	Yes	No
	B.	Records include all information outlined in (180 NAC 3-017.07)?	Yes	No
16.	.Bu	lletins and Information Notices		
	a.	Agency Bulletins, Agency Information Notices, Agency Newsletters, received?	Yes	No
	B.	Appropriate training and action taken in response?	Yes	No
17.	.Sp	ecial License Conditions or Issues		
	A.	Did auditor review special license conditions or other issues (e.g., non-rout maintenance)?	ine Yes	No
18.	. De	ficiencies Identified in Audit; Corrective Actions		
	A.	Summarize problems/deficiencies identified during audit.		

	В.	3. If problems/deficiencies identified in this audit, describe corrective actions planned or taken. Are corrective actions planned or taken at ALL licensed locations (not just location audited)?		
	c. 	Provide any other recommendations for improvement.		
19	.Ev	aluation of Other Factors		
	A.	Senior licensee management is appropriately involved with the radiation p program and/or Radiation Safety Officer (RSO) oversight?	rotecti Yes	
	B.	RSO has sufficient time to perform his/her radiation safety duties?	Yes	No
	C.	Licensee has sufficient staff to support the radiation protection program?	Yes	No